

October 22, 2021

BY ECF

Hon. James R. Cho
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jane Doe v. John Doe, 1:20-cv-05329-KAM-JRC—Status Letter

Dear Judge Cho:

We are counsel for Defendant John Doe in this action. To follow up on our letter of October 15, 2021, I write to inform the Court that the parties have met and conferred and propose the following discovery schedule:

- Document/written discovery to be completed by December 15;
- Party depositions to be completed by February 1;
- Non-party fact depositions to be completed by April 1;
- Expert disclosure to follow, on a schedule to be determined (the parties agree that expert testimony will be required but have not yet identified experts).

The parties respectfully request the Court to approve this schedule.

Respectfully submitted,



Niall D. Ó Murchadha